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8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 MARK MANIBUSAN,  
11

12 Plaintiff,

13 v.

14 NEVADA DEPARTMENT OF  
CORRECTIONS, *et al.*,

15 Defendants

Case No.: 3:17-cv-00303-MMD-CBC

**STIPULATION AND ORDER TO**  
**EXTEND DEADLINE TO RESPOND TO**  
**DEFENDANTS' MOTION FOR**  
**SUMMARY JUDGMENT**

(First Request)

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18 Pursuant to Local Rule 26-4, Plaintiff Mark Manibusan, by and through his  
19 counsel, Robert L. Langford, Esq., and Matthew J. Rashbrook, and Defendants Renee  
20 Baker, Dwayne Baze, Tara Carpenter, James G. Cox, James Dzurenda, and Ronda Larsen  
21 (the "NDOC Defendants"), by and through their counsel, Aaron D. Ford, Nevada Attorney  
22 General, and John C. Dorame, Deputy Attorney General, respectfully submit the following  
23 Stipulation and Order to Extend Deadline to Respond to Defendants' Motion for Summary  
24 Judgment. This Stipulation is the first request for such an extension, and is entered by the  
25 parties in good faith and not for the purpose of delay.

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**REASONS DEADLINE HAS NOT BEEN SATISFIED**

1. In order to fully address the complex legal arguments raised in Defendants' Motion, Plaintiff requires an additional two weeks' time to respond to the Motion for Summary Judgment, in order to complete necessary additional legal research.

**PROPOSED SCHEDULE**

The parties propose that the following current deadlines be extended by 14 days:

1. The current deadline is March 1, 2022. The Parties stipulate that deadline be extended to March 15, 2022.

For the foregoing reasons, Mr. Manibusan and the NDOC Defendants hereby stipulate to the above extensions.

IT IS SO STIPULATED, this 28th day of February, 2022.

/s/ Matthew J. Rashbrook

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/s/ John C. Dorame

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**ORDER**

Based on the foregoing stipulation, the deadline to respond to Defendants' Motion for Summary Judgment shall be extended as described.

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

This 1st day of March, 2022.